

Appl. No. 10/606,719
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the U.S. Patent and Trademark Office Public PAIR and that copy is enclosed herewith. It will be seen that several elements of the claims of the Johnson et al. patent are not supported by that provisional application. For example, claim 1 of the Johnson et al. patent calls for an iron-containing additive in the form of a free-flowing particulate having a P_{90} size of less than or equal to about 300 microns and for the coal-containing feed material to comprise ash and less than about 1 wt % sulfur and for the ash to contain less than about 10 wt % iron and at least about 20 wt % alkali. Applicant has not located in the Johnson et al. provisional application support for any of these element. Thus, the Johnson et al. provisional patent application cannot be a basis of priority for the Johnson et al. patent. Accordingly, the earliest application filing date for the Johnson et al. patent is that of application serial number 09/893,079: June 26, 2001.

As noted above, 35 U.S.C. §102(e), bars patentability for inventions described in "a patent granted on an application . . . filed . . . before the invention by the applicant for patent." Therefore, for the Johnson et al. patent to bar patentability of applicant's invention, the Johnson et al. patent application filing date must precede applicant's invention. The subject application is a continuation of an application filed on January 11, 2001. Thus, applicant's date of invention is at least as early as January 11, 2001, which is prior to the Johnson et al. filing date. Therefore, the Johnson et al. patent is not prior art to the subject claims. Because the rejections of claims 1-6, 9-10 and 16-21 as being anticipated by, and claims 7-8 as being obvious over, U.S. patent 6,729,248, to Johnson et al. are all based on the assumption that the Johnson et al. patent is prior art under 35 U.S.C. §102(e), the rejections are improper. Accordingly, favorable reconsideration and withdrawal of such rejections are respectfully requested.

Reconsideration is respectfully requested of the rejection of claims 1-10, 17 and 21 as obvious over the Buecker et al. article. The subject Office Action states that "Buecker is maintained for the reasons of record since Applicant has not established that zinc is a fluxing agent." However, applicant has indeed established in a prior response that it is common knowledge that zinc oxide is a fluxing agent. Thus, the rejection over the Buecker et al. article should be withdrawn.

Applicant directs the Examiner attention to the following comments from applicant's response before last, which provided the evidence that zinc oxide is a fluxing agent:

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Zinc and compounds of zinc are well-known fluxing agents and many references to such may be obtained from a quick internet search. For example, the website "Zinc Information Centre" at http://www.zincinfocentre.org/zinc_applications.html (print-out enclosed) states, "zinc oxide is a fluxing agent in the preparation of frits and enamels for ceramic wall and floor tiles." The comment posted at <http://www.potters.org/subject25297.htm> (print-out attached), quotes from *The Ceramic Spectrum*, by Robin Hopper, p.146, as follows:

Zinc Oxide. Zinc is primarily used as a fluxing agent for mid to high temperature glazes. It can, however, perform a dual function in the production of opaque glazes. It has a strong effect on many colorants, turning iron anywhere from pale yellow to mustard brown, chromium to brown, cobalt to grey blue, and nickel to blue, green or brown.

In its list of dry raw materials, Marjon Ceramics, Inc. (www.marjonceramics.com) identifies zinc oxide thusly:

ZINC OXIDE ZnO

A useful, high temperature flux. It increases the maturing range of glazes and produces bright, glossy colors. Also may be used to give opacity to glazes.

www.marjonceramics.com/pages/Product/rawmat.htm (copy enclosed). And Zaclon LLC (www.zaclon.com) repeatedly refers to zinc fluxing agents, including the following reference:

Zaclon LLC. manufactures the widest available range of solid and solution zinc ammonium chloride-based products, primarily used as galvanizing fluxes. http://www.zaclon.com/prods_galvflux.html (copy enclosed). Attention is also directed to US patent 4,042,731, which is directed to "A process which involves galvanizing with a galvanizing flux consisting essentially of a fluxing material selected from zinc ammonium chloride double salt and a mixture of zinc chloride and ammonium chloride and, as a foaming agent, sorbitol by dipping a metal article into a molten bath of zinc covered by said flux." It is believed that such references are sufficient to satisfy the Examiner's request for evidence that zinc compounds are fluxing agents. Accordingly, it is believed that the patentability of the subject claims over the Johnson patent has been established.

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Thus, applicant has established that zinc oxide is a fluxing agent and the rejection over the Buecker et al. article, which the Examiner has stated is based on the opposite belief, should be withdrawn.

In addition, it should be noted that the Buecker et al. article reports on a method of ADA Environmental Solutions, which appears to be the method of the Johnson et al. patent discussed above, which was assigned to ADA Environmental Solutions. This would explain the results reported by Buecker et al. and the reference by Buecker et al. to the ADA compositions included "a mixture of iron oxides and stabilizing chemicals . . ." See page 2 of 4, last full paragraph, of the Beucker et al. article.

The difference between the methods of Buecker et al. and Johnson et al. on the one hand and the invention of the subject claims on the other may be clearer with a little background on coal-fired power plant design. From chapters 9 and 10 of *Steam/Its Generation and Use*, published by Babcock and Wilcox, we learn as follows:

Background: Pulverized coal vs. cyclone boilers:

In a pulverized coal boiler, air and coal particles (70 % < 200 mesh—about the consistency of baking flour) are mixed and vented into a tall chamber. There are water pipes completely lining the chamber and as the coal burns, the heat is captured by these water walls. Unfortunately, when the coal particles are so small, the ash they produce is even smaller, and the fireball in the bottom of the chamber is so hot, it tends to melt these ash particles. The molten particles then adhere to the cold (relatively speaking) water walls and eventually build up a layer of solid slag. Depending on the composition of this solid slag, more or less heat will be allowed to pass through the slag to the water walls. If too little heat passes through, then later heat exchangers in the system will be overwhelmed and some of the precious heat will not be captured to be converted into electricity. Each pulverized coal boiler is designed to burn a specific kind of coal.

Different coals have different mineral contents. The majority of older power plants were designed to burn Eastern or Illinois bituminous coal. This coal had a relatively low calcium content and a relatively high sulfur content. The Clean Air Act mandated that power plants stop putting out so much sulfur oxides (the combustion product of sulfur from the coal, and which then reacts with water to form acid rain). The easiest

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solution was to change over to a low sulfur coal, such as is abundant in Wyoming's Powder River Basin. However, this coal has a very high calcium content, and calcium oxide is a white, (relatively) highly reflective, (relatively) highly insulating material. Thus, the solid slag from this coal on the water walls of a boiler designed to burn bituminous coal will not let enough heat through. Our invention addresses this by changing the thermal conductivity (and/or infra-red reflectivity) of that solid slag to allow greater heat transfer.

A cyclone-fired boiler, on the other hand, works in two stages. In the first stage, there is a small horizontal cylindrical water-cooled chamber where crushed coal particles up to a $\frac{1}{4}$ " diameter are injected into what is basically a horizontal tornado. They are thrown against the side of the chamber where they partially embed in a layer of molten slag. This is where they burn, leaving their ash in the slag where it melts. The excess molten slag is continuously removed from the chamber, and the hot combustion air, minus the ash, goes into a larger chamber with water walls where the heat is harvested. Note that there is no expectation of a layer of slag on these water walls—all the slag has already been captured in the primary combustion chamber. But this is the chamber where the majority of the heat transfer takes place.

As stated, for example, in claim 1 the subject invention is directed to "increasing the efficiency of the heat transfer of the furnace." To the extent Johnson et al. and Buecker et al. may be argued to suggest the possibility of using iron oxide without the fluxing agent in connection with coal-fired boilers, it is only with respect to cyclone boilers, which put a layer of molten slag on the walls of the boiler to capture the heat of combustion. The Johnson et al. and Buecker et al. method involves "...melting at least a portion of the coal-containing feed material and iron containing additive to form a slag layer on at least a portion of the surface of the combustion chamber, whereby coal in the coal-containing feed material is captured by the slag layer and combusted . . ." That is a cyclone fired boiler. As discussed above, at least part of the coal is burned in the slag and the heat is harvested in chambers that are free of solid slag. Thus, the boilers Johnson et al. and Buecker et al. are addressing are not boilers where the subject claimed invention is applicable.

Accordingly, favorable reconsideration and withdrawal of the rejection of claims 1-10, 17 and 21 as obvious over the Buecker et al. article are respectfully requested.

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Favorable reconsideration and withdrawal of the rejection of claims 1-10 and 16-21 as obvious over U.S. patent 5,819,672 to Radway et al. is also respectfully requested. The Examiner argues that Radway et al. refer to the fluxing agent as being only optional. However, it appears that the Examiner has ignored applicant's previous response pointing out that Radway et al. failed to appreciate the advantages of eliminating the fluxing agent and also failed in several other respects, as discussed in the previous response. As explained in the preliminary remarks submitted prior to first Action in this case and repeated in the previous response, the method of the Radway et al. patent, as described in the patent's specification, defined in the patent's claims and illustrated in the patent's working examples, is the standard prior art technique over which the present invention provides an improvement—it is the coating of furnace wall ash with a darkening agent. For example, the Radway et al. Abstract states, "The method involves exposing the walls to a darkening agent, or a combination of a darkening agent and a fluxing agent." And, again, in the Field of the Invention, Radway et al. state that "the invention relates to a darkening agent for darkening highly reflective deposits of thin ash . . ." And, again, in the Summary of the Invention, Radway et al. state, "The method involves exposing the walls to a darkening agent, or a combination of a darkening agent and a fluxing agent."

Although Radway et al., in passing, mention that the darkening agent alone may be used to darken the ash, the examples teach only the use of the darkening agent with a fluxing agent. The fluxing agent allows the darkening agent to adhere to the ash. By contrast, the method of the present invention does not involve exposing the furnace walls to a darkening agent and a fluxing agent. Moreover, as noted in the subject specifications the composition increases the efficiency of heat transfer of the furnace. The composition appears to increased such efficiency by increasing the thermal conductivity of the ash on the furnace walls. Nowhere do Radway et al. teach, suggest or realize that by eliminating the fluxing agent, surprising results contrary to the understanding of the art—that the fluxing agent may be eliminated, that such elimination results in an elimination of a need for a darkening agent, and that such elimination results in greater heat transfer efficiency—are obtained. Radway et al. further do not teach or suggest formation of calcium ferrite, as called for in the pending claims.

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The Radway et al. patent is directed consistently and single-mindedly to coating reflective ash build-up with a darkening agent and a fluxing agent.

Nor do Radway et al. provide any hint as to how to carry out its method (e.g., with respect to concentrations, type of iron ore, and techniques), let alone the claimed method. Radway et al. simply did not appreciate that if iron oxide were added to the coal in the proper amount, it would form calcium ferrite upon combustion of the coal, thereby obviating the need to coat white ash as it directs, and nothing in the Radway et al. patent so teaches or suggests. This surprising result is sufficient to establish patentability.

The Examiner has argued that a reference is not limited to the examples and preferred embodiments. However, such concepts are directed to anticipation rejections in which the actual presence in the prior art reference, regardless of the desirability, is at issue. The subject rejection is based not on anticipation, but on obviousness. The Examiner concedes that the teaching of Radway et al. differs from the claims. (Section 7 of the Office Action). Therefore, it is significant that Radway et al. clearly teach, claims, and require a combination of a fluxing agent plus darkening agent and *teach away from* elimination of a fluxing agent.

Adding the fluxing agent adds additional cost to the invention, and this cost may be significant as borates, the preferred fluxing agent, can cost \$1.00/lb. At the levels employed may well cause the invention to become cost-prohibitive. Nevertheless, despite this high cost, while Radway et al. speculate that using a darkening agent alone might be possible, it goes on to state that preferred embodiment of the invention includes the fluxing agent and gives no indication of ever having tried eliminating the fluxing agent. Radway et al. strongly prefer use of the fluxing agent despite this high cost. Thus, Radway et al. imply that use of the fluxing agent would be more than worth the extra cost. It is surprising, therefore, and nowhere suggested by Radway et al., that such superior results would be achieved without the fluxing agent. It teaches just the opposite. Accordingly, favorable reconsideration and withdrawal of the rejection of claims 1-10 and 16-21 as obvious over U.S. patent 5,819,672 to Radway et al. are respectfully requested.

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In view of the foregoing, it is submitted that all pending claims distinguish patentably over the art of record and are in condition for allowance. Therefore, favorable reconsideration and early allowance of all pending claims are earnestly solicited.

Respectfully submitted,

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PROVISIONAL APPLICATION COVER SHEET

This is a request for filing a PROVISIONAL APPLICATION FOR PATENT under 37 CFR 1.53(c)(2).

Docket Number	3791-13-PROV-2	Type a plus sign (+) inside this box -	+
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TITLE OF THE INVENTION (280 characters max)

"LOW-COST TECHNOLOGY TO IMPROVE OPERATION OF CYCLONE FURNACES FIRING LOW-SULFUR
WESTERN COALS"

CORRESPONDENCE ADDRESS

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ENCLOSED APPLICATION PARTS (check all that apply)

<input checked="" type="checkbox"/>	Specification	Number of Pages	7	Small Entity Statement
<input checked="" type="checkbox"/>	Drawing(s)	Number of Sheets	0	Other (specify)

METHOD OF PAYMENT (check all that apply)

<input checked="" type="checkbox"/>	A check or money order is enclosed to cover the filing fees	19-1970	PROVISIONAL FILING FEE AMOUNT (\$)	\$150.00
<input checked="" type="checkbox"/>	The Commissioner is hereby authorized to charge filing fees and credit Deposit Account Number:			

The invention was made by an agency of the United States Government or under a contract with an agency of the United States Government.

 No. Yes, the name of the U.S. Government agency and the Government contract number are: _____

Douglas W. Swartz
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Low-cost Technology to Improve Operation of Cyclone Furnaces Firing Low-Sulfur Western Coals

00243514-002800

Abstract

The present invention discloses a process to enhance the operational performance and cost-effectiveness of cyclone furnaces firing low-sulfur Western coals by adding to the fuel quantities of low-cost, iron-bearing materials produced as a byproduct of iron and steel manufacturing. Cyclone furnaces are designed to collect and discharge ash from the coal as a molten liquid known as slag. In order to melt into a slag at normal combustion temperatures (2600-3000 F), cyclone furnaces are designed to burn coals whose ash contains high amounts of iron and low concentrations of alkali and alkaline earth metals. The iron both reduces the melting temperature of the ash, and increases the slag viscosity at these temperatures due to the presence of iron aluminosilicate crystals in the melt. When low-sulfur western coals, with low iron and high calcium contents, are fired in these boilers, the viscosity of the slag is not in the proper range to provide satisfactory operation of the furnace and results in poor combustion. To overcome these slagging problems, utilities must crush the coal to a smaller size, blend in high-iron coal or add iron pellets (iron filings, scrap iron, or iron ore have also been used), all of which greatly increase operating and maintenance costs.

The use of inexpensive iron-bearing byproduct material is a novel means to provide a less costly fix to this problem. In addition to being less expensive, the physical characteristics of these materials provide additional benefits that potentially make them more effective than the other sources of iron. However, to provide an effective system for enhancing combustion in cyclone furnaces, there are several key steps in this process including proper selection of candidate material, treatment of the dust to allow handling and shipping, blending with the coal, and control of the feedrate.

Field of Invention

This process is applicable for use in the coal-fired electric utility industry. It is specifically of use for utilities that employ cyclone furnaces to fire low iron, high-alkali coals such as those found in the western regions of the United States. The invention may also be extended by those skilled in the art to apply to any industrial boiler that produces a molten, liquid ash residue (known to the industry as "wet-bottom" boilers).

Background of Invention

Cyclone furnaces are used to generate steam for power production and industrial processes. Such a furnace is diagrammed in figure 1. The furnaces operate by maintaining a sticky layer of fluid ash (slag) on the inside walls of the cyclone combustor. Coal is crushed to a 1/4-inch top size and blown into the burner end of the cyclone combustor. The whirling motion of the combustion air (hence the name "cyclone") propels the coal toward the furnace walls where the coal is caught like flies in flypaper and burns in the slag. Products of combustion exit the cyclone through an opening called the re-entrant throat at the opposite end from where the coal was introduced. Molten slag flows slowly through a spout to a hole in the bottom of the boiler where it is water-quenched and recovered as a saleable byproduct. The ash composition is critical to prevent the slag from freezing in the hole and causing pluggage. Therefore, cyclone furnaces were located in the mid-west to burn local high-sulfur, high-iron coals. Over time, cyclone furnaces have been converted to burn low-sulfur coal to satisfy environmental regulations limiting SO₂ emissions.

When certain high-calcium, low-sulfur coals from the Powder River Basin of Montana and Wyoming are burned in these furnaces, the cyclones do not develop a thick enough layer of sticky slag and the coal is not caught. This poor slag coating leads to unburned coal, degraded performance of particulate collectors (leading to stack opacity violations), and increased fuel and maintenance costs. The sticky slag layer can be reestablished by increasing the iron content of the coal.

It has been known for many years that iron is an effective fluxing agent for certain alumino-silicate glasses. Iron oxide fluxes high-silica glass, while reduced forms of iron (FeO or Fe-metal) flux calcium-rich glass. In the presence of burning coal particles, iron exists primarily in reduced form. Its use has been recommended to solve slag-tapping problems in cyclone furnaces by either blending in high iron coal or adding commercially available iron pellets, both of which are very expensive. The pellets (due to their size) have a further disadvantage of forming pools of reduced iron that can be very corrosive to metal or refractory surfaces exposed to it. Therefore, iron fluxes have never achieved long term acceptance in the utility industry.

The use of inexpensive iron-bearing byproduct material is a novel means to provide a less costly and technically superior fix to this problem. In addition to being less expensive, the physical characteristics of these materials provide additional benefits that potentially make them more effective fluxes than commercially available sources of iron.

Summary of Invention

It is the object of the present invention to improve the performance of cyclone furnaces burning low-iron, high-alkali coals by enhancing the slagging characteristics of the ash through the addition of low-cost iron byproducts.

However, to provide an effective system for enhancing combustion in cyclone furnaces, there are several key steps in this process including:

- proper selection of candidate material,
- treatment of the dust to allow handling and shipping,

- design of equipment to blend the flux with the coal,
- design of a control system to adjust additive feed rate.

It is the use of these byproducts of steel and iron manufacturing to flux the ash and improve the cyclone operation that is new and unique.

Several candidate byproduct materials are available to provide a source of iron that can be technically acceptable, such as:

- Basic Oxygen Furnace (BOF) flue dust or precipitator fines.
- Blast Furnace flue dust
- Electric Arc Furnace dust
- Mill Scale fines

The materials are generally more than 50% iron by weight and are dusty or powdered. The preferred embodiment of this invention uses iron-bearing waste products containing more than 80% iron. Also, sludges containing iron plus oils and greases produced during metal finishing operations are suitable. These materials have the advantage of preventing fugitive emissions during handling and shipping. In addition, combustion of the oil or grease is also of value to boiler operators by replacing the heat input requirement from the coal and thus reducing fuel costs for producing electricity. An additional source of iron-bearing material is red mud from the bauxite mining industry.

The most favorable material was found to be flue dust and electrostatic precipitator dust from blast furnaces or BOF's. These are very fine dusts collected from iron or steel making furnaces. The material contains primarily Oxides of Iron and other metals in small amounts.

The elemental analysis of BOF flue dust was used to model its effect on PRB coal ash viscosity and the subsequent effect on the cyclone slag layer. The slag viscosity model showed that the BOF flue dust, when added to the coal to increase the ash iron percentage to 30% by weight, increased the thickness of the sticky layer in the cyclone by about 60%. The model also showed that the temperature at which the ash would have a viscosity of 250 poise would be reduced by at least 100°F. This temperature is an important indicator of the minimum

temperature at which the slag will flow. If the temperature at which the ash has a viscosity of 250 poise or lower is too high, then the slag will not flow to the slag tap on the floor of the boiler and will build up inside the boiler casing. This has been a problem on cyclone furnaces burning western coal at less than full design output.

Further, experience has shown that the presence of iron in the calcium aluminosilicate slags causes crystal formation in the melt when a critical temperature (T_{cv}) is reached. These crystals change the flow characteristics of the slag causing it to thicken before it can flow. This phenomenon is known as "yield stress" and is familiar to those skilled in the art of non-Newtonian flow. Thicker slag allows the slag to capture and hold more coal particles. Therefore, much fewer coal particles escape the combustor without being burned.

To ADA-ES's knowledge, the alternatives when burning Powder River Basin coal in cyclone furnaces are to blend other more expensive coals which have high iron, or to add iron pellets to the coal. High iron coals always have high sulfur because the predominant form of iron in coal is iron sulfide (pyrite). Therefore, coal blending is prohibited by law due to increased sulfur emissions. A third alternative is to grind the coal going into the cyclone furnace much finer in order to increase the percentage of combustion that occurs for coal particles in flight. This option requires expensive modifications or replacement of grinding equipment, but moreover, it is counter to the original design and intent of the cyclone furnace and seldom solves the problem. All of these alternatives are much more expensive than the use of this byproduct material. Also, the smaller particle size of the iron byproduct material is better than larger forms of iron because the surface area of the fluxing material in contact with the slag drives the speed of a fluxing reaction. Therefore, the larger surface area of the dust compared to 1/4-inch pellets promotes fast and efficient fluxing.

Because of the small size of much of the available byproduct material, it can result in high fugitive dust emissions during handling and transportation. Therefore, a key step in this invention is to treat the material to provide acceptable dusting characteristics. The treatment can take place at the source of the material, at a transportation terminal, or at the plant site. There are several different types of treatment including:

- Adding water to the material. Laboratory tests have confirmed that the BOF dust is hydrophilic and mixes well with water. Adding water to the material forms a cohesive layer on the wetted surface after drying, which will eliminate fugitive emissions from the pile.
- The hydrophilic nature of the iron materials also means that they can be mixed as a slurry and made into any form desirable for shipping. Briquettes of the material can be made to decrease dust emissions during handling.
- Chemicals can be added to the slurried material to increase the cohesiveness of the final material. Laboratory tests have shown that xantham gum and phosphoric acid lead to very cohesive products.
- Spraying with conventional dust suppression chemicals such as calcium lignosulfonate can treat the material to prevent handling problems. This material is commonly used to reduce coal dust emissions, and can be applied at a range of concentrations from 1% to 10% at a cost of \$0.40 to \$4.00 per ton.

The byproduct iron material must be shipped from the source to the power plant. Shipping the material from the source to the furnace will be the most expensive part of the process. The material can be shipped by truck, rail, or barge. It is important to minimize the distance being shipped and the number of transfers.

The next step in the process is mixing the material with the coal and feeding to the furnace. The iron fluxing material can be added at a variety of locations including:

- Mixing with the coal at a shipping terminal
- Adding to the coal reclaim belt
- Adding to the coal bunkers
- Using an eductor to aspirate the material and add to the coal or primary air streams.

The final step in the process is to control the feedrate of the material. This can involve either feed forward or feedback control. The feed forward control would be based upon the chemical analysis of the coal being feed from the boiler. Feedback control could come from a variety of measured characteristics of boiler operation and downstream components such as:

- LOI as measured by on-line furnace analyzer
- Carbon content in ash as determined from ash samples extracted from the flue gas or precipitator hopper.
- Furnace exit gas temperature, which will decrease with less coal carryover from the cyclones.
- Slag optical characteristics such as emissivity or surface temperature.
- Slag tap flow monitoring.
- Stack opacity.

The preferred feed system for cyclone boilers is shown on Exhibit A (see KCBPU Proposal). The fluxing agent is transported pneumatically from covered railcar or truck to a storage silo where it is disengaged from the transport air by a bin vent filter. Level indicators in the silo show when the silo is full or nearing empty. The fluxing agent is discharged from the storage silo to a weigh feed bin through a rotary valve to the coal line. The mixture of coal, fluxing agent, and conveying air are then carried to the cyclone burner.

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In order to complete our patent application and maintain our filing date we need to update our provisional patent application. The following items have been discovered in the course of our research in the past year and should be included in the filing. Please feel free to edit, add or subtract from these points as you see fit.

- The current embodiment of ADA-249 contains 2-8% zinc. Zinc is a known mineralizer in the cement industry. Mineralizers are substances that reduce the temperature at which the cement clinker sinters by providing more contact points for mass transfer. As such, mineralizers could enhance the rate at which iron fluxes with PRB coal ash. A range of 0.5-15% zinc is preferred in this application. A range of 2-8% is more preferred.
- The dusty, powdered iron material that is described in the patent application is extremely cohesive, and thus has a tendency to form dense, hard deposits in the delivery system. A number of flow aids and abrasive materials can be added to the material to aid in its handling. Possible flow aids include less than 5% of: ethylene glycol, proprietary agents known as "grind aids", and any other substance intended to reduce particle to particle attraction or sticking through electrostatic or mechanical means. Also included are any of a number of abrasive agents in the amount of 2-20% by weight. These agents include sand, blasting grit and boiler slag.
- Results of testing to date:
 - ADA-249 fed at about 20 lb/t coal allows slag to flow at lower temperatures. As a result, the boiler is able to operate overnight at lower load (60 MW without ADA-249, 35 MW with it) without freezing the slag tap and risking a boiler shutdown. The advantage is that the boiler can be operated at lower load (and more efficient units can operate at higher load) when the price of electricity is below the marginal cost of generating the electricity, thus saving on fuel costs. A rough estimate of the cost savings for KCBPU is about \$200K/y.
 - ADA-249 allows the cyclone boiler combustion process to operate more efficiently. These boilers are designed to burn the coal in a slag layer coating the cyclone barrel. When burning PRB coal, this slag layer is generally too thin and watery to capture the majority of the coal. Thus the coal burns in flight. This causes an increase in unburned coal and a decrease in boiler efficiency. To counteract this effect, additional air is supplied to the boiler and the coal is crushed more finely. This further decreases the boiler efficiency and increases the auxiliary power required to operate the boiler. Video recordings have shown that, with the additive, less unburned coal blows through the cyclone, which implies that the combustion process is operating closer to the way cyclones were designed to run.

EXHIBIT A
DRAFT

Base System Layout

